DATA EVALUATION REVIEW 5

I. Study Type: residue accumulation in rotational crops, Guideline 165-1

II. Citation:

Stumpf, K. **supplement to** *HOE 039866-^{14}C, Residue Determinations and Metabolism in Rotational Crops Sown 120 Days After Treatment of Soil (MRID# 413231-26).* performed by Hoechst AG, Frankfurt, FRG, submitted by Hoechst Celanese Corp., Somerville, NJ. received EPA 6/21/91 under MRID 419201-05.

III. Reviewer:

Typed Name:	E. Brinson Conerly-Perks
Title:	Chemist, Review Section 3
Organization:	EFGWB/EFED/OPP

IV. Conclusions:

The submitted material removes one of the two deficiencies, that of the method sensitivity. However, the data will only support an application rate of 1 kg a.i./ha.

V. Materials and Methods: n.a.

VI. Study Author's Results and/or Conclusions: n.a.

VII. Reviewer's Comments:

One of the previous comments had to do with sensitivity of the method. The applicant has provided a discussion of the limitations of sensitivity, which are in part imposed by legal regulations restricting the amount and specific activity of radioisotope which could be used. This deficiency is resolved.

However, a second deficiency is not satisfactorily resolved. The application rate for wheat (1 kg a.i./ha) was roughly half of the maximum label rate (1.68 kg a.i./ha), and therefore the study will only support the rate tested. A similar study done on corn at 1.9 kg a.i./ha, which is described in the submission, cannot substitute.

VIII. CBI Information Addendum: attached